From:

"McNeill, Mike A (HQ-LD020)" <mike.a.mcneill@nasa.gov>

To:

<fb4p@oce.usda.gov>

Date:

Fri, Dec 8, 2006 9:05 AM

Subject:

[Docket No: RIN 0503-AA32];[FR Doc: 06-08368];[Page 59861-59883]; Biobased

products; designation guidance for Federal procurement

The National Aeronautics and Space Administration (NASA) appreciates the opportunity to participate in reviewing and providing comments on this proposed rule. NASA has found two areas to provide comments: (1) the lack of infrastructure and mature incentive programs to offset the cost impact of segregating bioplastics and conventional plastics and; (2) a positive commendation to USDA for the addition of environmentally beneficial items which are highly visible and will have a wide impact across public and private sectors.

First, NASA recognizes that a transformative industry such as biobased product industry cannot be deployed instantly and that it will emerge over time, but there are concerns about the lack of infrastructure in place to support USDA's initiative effectively. The concern involves the segregation of bioplastics and conventional plastics. Currently, biobased plastics such as polylactic acid (PLA), cannot be mixed with conventional plastics such as polyethylene (PET) because the materials are not compatible for recycling purposes. PLA is a minor contaminant if mixed with petroleum-based plastics such as PET and it is not recommended that programs routinely mix PLA with PET. At present, PLA itself can be recycled, but it is important to note that the recycling industry infrastructure is not currently configured to implement segregated collection and recycling of PLA plastics, and there are no well-established manufacture buy-back type programs to incentivize and facilitate local or regional composting and recycling to turn PLA back into PLA.

Secondly, NASA commends USDA for introducing environmentally beneficial items which have highly visibility and a wide impact across both public and private sectors. Products such as bath and tile cleaners are readily available in the market and as the federal government commits its buildings to be cleaned with environmentally safe products, janitorial supply companies will follow suit and replace their inventory with these products which will, in turn, influence the private sector and USDA's ability to market "green consumerism."

If you have questions or desire clarification regarding these recommendations, please contact Mike McNeill, NASA Headquarters, Environmental Management Division at (202) 358-1886 or mike.a.mcneill@nasa.gov.

Mike A. McNeill, P.E.
Environmental Engineer
Environmental Management Division
NASA Headquarters
Suite 5E39, Room 5A30
300 E Street SW
Washington, DC 20546-0001
(202) 358-1886 FAX (909) 380-8607